State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENERGY

CHRISTINE TODD WHITMAN
Governor

ROBERT C. SHINN, JR.
Commissioner

SEP 15 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Edward A. Hogan
Porzio, Bromberg & Newman
163 Madison Avenue
Morristown, NJ 07960

RE: Hexcel Corporation (Hexcel)
Lodi Borough, Bergen County
ISRA Case #86009

Dear Mr. Hogan:

The New Jersey Department of Environmental Protection (NJDEP) has completed a review of the revised schedule for the projected completion of all remedial activities and associated cost estimates included with Marjorie A. Piette's letter dated May 5, 1994. Based on the review, the Remedial Activities Schedule is not acceptable since the initiation of all remedial activities outlined in the schedule is dependent upon first obtaining approval from Fine Organics Corporation for the temporary use of their existing sewer line. This condition of the schedule will unduly prolong the remediation of the site as an agreement between Hexcel and Fine Organics Corporation on the use of the sewer line is not expected to occur in the near future. In addition, even if an agreement was to transpire, the Passaic Valley Sewerage Commissioners (PVSC) will only accept treated groundwater from Hexcel if it is discharged through a separate sewer line and not through Fine Organic Corporation's existing sewer line.

As the disposal option for treated groundwater is the limiting factor in the remediation of the Hexcel site, Hexcel shall document its efforts in trying to resolve the ongoing conflicts between the Fine Organics Corporation and Hexcel. The NJDEP will allow Hexcel an additional 30 days to finalize an agreement with the Fine Organics Corporation and obtain all the necessary endorsements required for the permits needed to install a separate sewer line. During this 30 day period Hexcel shall evaluate whether P.L. 1993, c.139 (S-1070), specifically section 40 (site access for remedial activities), will assist Hexcel in obtaining all the necessary endorsements from the Fine Organics Corporation. If the endorsements cannot be obtained within this time frame, Hexcel shall evaluate the feasibility of utilizing reinjection to ground water and off-site disposal as temporary alternatives until the sewer line can be installed. If the endorsement cannot be obtained, regardless of the timeframe, Hexcel shall re-evaluate the feasibility of utilizing discharge to ground water, discharge to surface water or off-site disposal as permanent disposal options in place of utilizing a new sewer line. Please be advised that the remediation of ground water can no longer be delayed due to the inability of Hexcel to resolve the ongoing conflicts between itself and the Fine Organics Corporation.

Though the revised schedule is unacceptable due to the reason stated above, Hexcel is advised that the fundamental core of the schedule is acceptable and shall be immediately implemented with the following conditions.

1. Hexcel shall resume the dense non-aqueous phase liquids (DNAPL) monitoring in accordance with the approved DNAPL monitoring plan. The last results received by the NJDEP were those for October 1993.

2. Hexcel shall proceed with the proposed DNAPL recovery and submit details on the design of the temporary DNAPL recovery system within 30 calender days of receipt of this letter. Be advised, that the recovery program must satisfy the objectives of the recovery program approved by the NJDEP's January 19, 1993 and May 4, 1993 letters. Furthermore, Hexcel can no longer defer the implementation of DNAPL recovery due to the lack of a permanent ground water discharge point. Hexcel shall immediately implement the DNAPL recovery system and dispose of the treated ground water off-site along with the basement seepage water.

3. Hexcel shall resume the light non-aqueous phase liquids (LNAPL) monitoring in accordance with the approved LNAPL monitoring plan. The last LNAPL monitoring results submitted to the NJDEP were those for October, 1993.

4. Hexcel shall resume the LNAPL recovery in accordance with the approved LNAPL recovery program. Be advised that the last results submitted were those for October, 1993.

5. In the NJDEP letters dated January 19, 1993 and May 4, 1993 the NJDEP approved a water level monitoring program to provide a baseline for the demonstration of hydraulic control. Hexcel initiated the water level monitoring program in May, 1993, with the last water measurements submitted for September, 1993. Hexcel shall either resume the approved water level monitoring program or submit an alternate proposal for the development of water level data.

6. Hexcel states in the schedule that a ground water recovery system will be designed but does not indicate what portions of the overburden aquifer will be targeted for recovery. Hexcel shall clarify this issue. As Hexcel has been previously advised that the high concentrations of contaminants detected in the lower overburden unit in the area of MW1 warrant hydraulic control, Hexcel shall incorporate the recovery of ground water in the lower overburden unit in the area of MW1 into the design of the recovery system.

7. The NJDEP allows the usage of Geoprobe and similar alternative ground water sampling techniques to optimize the placement of monitoring wells and on a case by case basis as stand alone data points of ground water evaluation. Since Hexcel has been previously denied access to the property on the opposite side of the river and this sampling technique may encourage the property owner to grant access, Hexcel may use the Geoprobe to investigate the ground water quality on the opposite side of the Saddle River. This proposal is acceptable with the following conditions. Hexcel shall provide a detailed proposal which describes how the samples will be collected and analyzed, including the depths and locations of all samples. In addition, the proposal shall include a scaled site map which depicts the Hexcel site, the Saddle River, the property opposite the Hexcel site and the proposed sampling locations. Please be advised that monitoring well(s) may still be required after the NJDEP review of the ground water sampling results.

8. The proposal to evaluate the feasibility of installing a DNAPL barrier along the river is acceptable. The NJDEP emphasizes that the purpose of the barrier would not be to contain ground water but would be to prevent DNAPL from discharging to the river. The NJDEP's concern is that DNAPL pumping, while necessary, will not prevent DNAPL from migrating. The NJDEP would entertain a proposal for any type of barrier as long as the barrier was designed to prevent DNAPL from discharging to the river. In the proposal, Hexcel shall include a thorough evaluation of the distribution of DNAPL and all areas where DNAPL may potentially be discharging to the river.

9. The proposal to defer the installation of the bedrock monitoring well until after the establishment of hydraulic control of the overburden aquifer is unacceptable. Though the NJDEP acknowledges Hexcel's concern for cross-contamination, the NJDEP does not approve of a lengthy deferral for the bedrock investigation. Hexcel shall submit a proposal for the bedrock investigation or provide additional information to substantiate the assertion that hydraulic control of the overburden aquifer is warranted before the installation of any bedrock monitoring wells.

<u>September 17, 1993 Monthly Progress Report</u>

The following are NJDEP's comments concerning the above referenced monthly progress report. Please be advised that due to Hexcel's request to defer most of the site's remedial activities, the NJDEP deferred comments on this progress report until this time.

10. The proposal for no further action in regard to sediment sampling of the storm sewer outfall into the Saddle River is unacceptable. Hexcel has collected a single sediment sample at the outfall of the storm sewer while the NJDEP's letter dated July 12, 1991 required Hexcel to collect sediment samples at the discharge point, and at intervals of 10 feet, 20 feet and 30 feet downstream. Hexcel agreed to this sampling requirement in its letter dated August 9, 1991. In addition to Hexcel's failure to adequately sample the river sediments, the report does not comply with the Technical Requirements for Site Remediation, N.J.A.C. 7:26E-4.9 (a) and (b) in that the sample location was not mapped, nor were any details provided relative to the location or collection of the sample provided.

The sediment sample was analyzed for polychlorinated biphenyls (PCB) with Arochlors 1248 and 1254 detected at concentrations of 0.260 parts per million (ppm) and 0.180ppm, respectively. Hexcel indicates that since the total PCB concentration is below the residential soil cleanup criteria for PCB's and in addition the Arochlor 1254 has never been identified on site, no further action is warranted. While Arochlor 1254 has never been identified on site, it is not clear if the transformer identified in the NJDEP Report of Inspection dated September 15, 1986 and Hexcel letter dated October 20 1986 could be a potential source of the contamination. In fact, the October 20, 1986 correspondence states that "according to Public Service Electric & Gas Company, the one transformer located on the property is presumed to be PCB contaminated". This unit does not appear to have been depicted on any site maps nor is it clear if this unit was ever investigated. Hexcel shall clarify this issue and document whether the transformer may potentially be a source of PCB's detected in the sediment sample.

Please be advised that the even though the above mentioned results are below the residential soil cleanup criteria for PCB's, these criteria are not applicable for sediment samples. The NJDEP currently utilizes the USEPA PCB Sediment Quality Criteria (SQC) (<u>Guidance on Remedial Actions for Superfund Sites with PCB Contamination</u> EPA/540/G-90/007) and the NJDEP <u>Guidance for</u>

Sediment Quality Evaluations (copy enclosed) to evaluate impacts potentially harmful to aquatic life. In addition, the direct comparison of the result with the SQC is not possible without an accompanying Total Organic Carbon (TOC) concentration.

Concern for the PCB contamination of the Saddle River is based upon the previous existence of two cross-connections between the site's industrial sewer and storm sewer systems. Previous analyses of the sediments of the industrial and storm sewers indicated elevated levels of PCB's. Therefore, Hexcel shall complete the sediment sampling as previously required. As noted in the July 21, 1991 NJDEP letter, Hexcel shall collect the samples in depositional areas and/or stained or discolored areas. In addition to PCB's, Hexcel shall analyze the samples for TOC. Hexcel shall submit a scaled site map, depicting the present and previous sample locations, the locations of the storm drain outfall, any other discharge lines, channelized and/or culverted areas, and scour and depositional areas within the studied reach of the river. Additionally, Hexcel shall also report stream velocity. Hexcel shall refer to the USEPA Guidance on Remedial Actions for Superfund Sites with PCB Contamination (EPA/540/G-90/007) and the NJDEP Guidance for Sediment Quality Evaluations when reporting the results of this investigation and with making any future proposals related to sediments.

General Comments

11. Since the May 5, 1994 cost estimate indicates an increase in the total cost for the implementation of the site's remediation, Hexcel shall, in accordance with P.L. 1993, c.139 section 25, increase the funding source to an amount equal to the highest estimated cost of remediation.

12. Hexcel shall provide an update on its bankruptcy proceedings and document whether its reduced financial resources will have any effect on the implementation of the May 5, 1994 remediation activities schedule.

13. Hexcel shall provide an update on the status of all permits required to complete the remediation at the site.

14. Hexcel shall submit the disposal documentation which bears the signature of the disposal facility for all of the treated ground water removed off-site since November 30, 1992.

15. Hexcel shall provide an update on the disposal of all accumulated waste (DNAPL, LNAPL, sludge from the ground water treatment system etc.) at the site.

16. Hexcel shall provide an update as to whether the treatment and proper disposal of basement seepage water has been resumed.

17. Hexcel shall submit a revised schedule ,pursuant to the Technical Requirements for Site Remediation, N.J.A.C. 7:26E-6.5 which incorporates and addresses items 1-16 above and paragraph 2 of this letter and any additional information required by this letter within 30 calendar days of receipt of this letter.

If you have any questions regarding this letter, please contact the Case Manager, Joseph J. Nowak, at (609) 777-0899.

Sincerely,

Douglas Stuart, Chief
Bureau of Environmental Evaluation and
Cleanup Responsibility Assessment

c: A. William Nosil, Hexcel Corporation
James Higdon, Fine Organics Corporation
Barclays Bank